

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

*IN RE CATTLE AND BEEF ANTITRUST  
LITIGATION*

Case No. 20-cv-1319 (JRT/JFD)

This Document Relates To: ALL CASES

**FOURTH STIPULATION REGARDING STRUCTURED DATA PRODUCTIONS**

The Plaintiffs along with JBS USA Food Company, JBS Packerland, Inc., Swift Beef Company, and JBS S.A. (“JBS”) (collectively with Plaintiffs, the “Parties”), by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS, at the June 17, 2022, case management conference, the Court set a deadline of July 14, 2022, for the Parties to complete the meet and confer process related to: (1) the scope issues about JBS’s structured data productions, and (2) outstanding requests for production [Doc. No. 570];

WHEREAS, pursuant to the Court’s order, Plaintiffs must file any motions on unresolved disputes pertaining to those topics no later than July 21, 2022, and JBS’s responses will be due two weeks after the motion is filed [Doc. No. 570];

WHEREAS, the Parties have received extensions of the above deadline concerning completing the meet and confer process for scope issues about JBS’s structured data productions [Doc. Nos. 608, 616, 636];

WHEREAS, the Parties have been able to reach agreement on everything but one narrow issue whereby Plaintiffs have requested and JBS has agreed to investigate the existence and scope of certain structured data relating to beef inventory.

WHEREAS, the parties seek what they believe will be the last extension of the deadlines to allow the parties to continue to meet and confer on the one remaining issue in an attempt to avoid motion practice;

BASED ON THE RECITALS ABOVE, the Parties hereby stipulate and agree, subject to the Court's approval, as follows:

1. The Parties must complete the meet and confer process related to the scope issues about JBS's structured data productions by September 15, 2022.
2. Plaintiffs must file any motions on unresolved disputes pertaining to those topics no later than September 22, 2022, and JBS's responses will be due two weeks after any motion is filed.

Consistent with the above, the Parties respectfully request that the Court enter an order extending the deadlines as to JBS.

Dated: September 1, 2022

Respectfully submitted,

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